varies. SWBT's provision of OSS documentation to CLECs ranges from simple brochures to complex technical interface requirements, depending on the negotiation phase, type of interface and level of interest demonstrated by the CLEC.

51. Over the past year, SWBT has held countless meetings with AT&T on OSS interface development and provided AT&T all documentation it has requested. Until recently, Sprint and MCI have not been prepared or interested to discuss OSS implementation in such detail. During the second quarter of 1997, Sprint and MCI requested detailed OSS implementation meetings that warranted review of SWBT's EDI Gateway interface documentation. In March, SWBT provided MCI and Sprint its EDI ordering requirements document in preparation for these meetings. During separate meetings, neither MCI nor Sprint were prepared to discuss the EDI ordering interface, or any interfaces in detail. Instead, these meetings involved a high level review of interface capabilities so that MCI and Sprint could determine and set direction on which interfaces will meet their market entry and information services objectives. SWBT is ready to hold additional meetings and provide whatever information is necessary to document and clarify any question or requirements of our interfaces. Again, it is hard to understand how these allegations could have been made by these CLECs without any basis of facts and more importantly, for the Department to blindly accept the allegations as fact.

52. The Department must misunderstand SWBT efforts when it states SBC has failed to make resale services and UNEs practicably available because of lack of adequate automation.[37] SWBT's EASE interface provides the capability of order flow-through for basic residence and business services. SWBT's EDI Gateway has also been designed for mechanized order flow-through to

[37] DOJ TAB A at 78

downstream OSSs. SWBT has developed complete flow-through for the highest volume orders (e.g., POTS resale conversions) and plans to continue to automate other types of orders (e.g., resale new connects, disconnects, etc.) in the priority of expected demand.

53. As I have previously detailed in paragraphs 25 and 26 of this affidavit, SWBT has developed its EDI interface (and is completing LEX) for UNEs to enable CLECs to electronically order not only individual UNEs but combinations as well. Consequently, both the Department's statements regarding lack of UNE automation and failure to support electronic ordering/provisioning capability for combinations of UNE are at best confusing. Both, SWBT's EDI Gateway and LEX interfaces fully support the electronic ordering of all unbundled elements and combinations as are currently defined by the OBF, including the Loop with Switch Port combination.

CONCLUSION

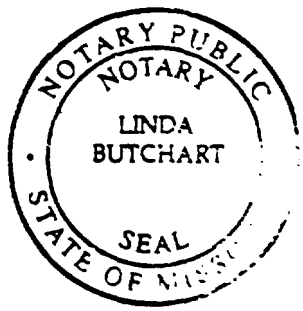
54. SWBT is providing a variety of electronic choices for all CLECs entering the local market. SWBT has followed national standards for all five OSS functions where they exist and will continue to deploy the same as they are finalized. SWBT will provide assistance to CLECs that wish to use SWBT's electronic OSS interfaces. SWBT meets the requirements of the Act and is in compliance with the FCC's orders in terms of providing CLECs with "at least equivalent electronic access" to its OSS functions that it provides "to itself, its customers, or other carriers." SWBT has also gone even further to provide CLECs with choices of both industry standardized interfaces and negotiated interim interfaces for access to its OSS functions that it did not provide to itself, its retail customers, or other carriers prior to the Act.

The foregoing affidavit is true and correct to the best of my knowledge, information, and belief.

Elizabeth A. Ham

ELIZABETH A. HAM
EXECUTIVE DIRECTOR - INTERCONNECTION & RESALE
SOUTHWESTERN BELL TELEPHONE COMPANY

Subscriber and sworn before me, the undersigned authority, on this 20th day of May, 1997.



Linda Butchart

NOTARY PUBLIC

LINDA BUTCHART
NOTARY PUBLIC STATE OF MISSOURI
ST LOUIS COUNTY
MY COMMISSION EXP NOV 19,1998

May 22, 1997

SWBT EDI Ordering Interface Testing Summary

Receive/edit/format/send EDI records

- Unit tests began in December, 1996 to test new orders, disconnects, transfer as is, loop, port, loop with port, hunting, directory listing, and directory delivery.
- From 8 to 10 runs per case were done to test and modify the maps and application programs.
- Files were sent for downstream processing with each case doing 6 to 10 test runs.
- Data received from AT&T was used for an additional test 2 to 3 times to validate mapping and pass downstream for combination editing.
- EDI handling of acknowledgments and the FOC/SOC processing were tested 2 times.
- Generation of EDI transactions for 997, 855, and 865 record types were tested approximately 10 times each.
    - 977 acknowledges the receipt of the EDI record; 855 acknowledges the processing or errors found in the initial service order that was transmitted; 865 acknowledges the processing or errors found in any supplements to the original order and also sends completion notices after the order is provisioned.
- System testing with AT&T began in April 1997.
- During the week of May 12, testing was performed with files sent from AT&T which included a "test" new connect, a supplement and a conversion order.

Perform data and relational edits and create downstream feeds

- Initial unit testing of the various programs in this system involved over 1000 tests conducted in early 1997.
- Formal integrated component testing began in March 1997.
- These formal tests involved the creation of batches of test orders, running them through front-end edits, creating error files to be returned and creating a file to send for downstream mechanized order generation processing.
- Additional tests involving the FOC/SOC process were done in April.

- A full system test began on May 20, 1997 using over 150 test cases and test service orders.
- A Test Base of 161 orders has been created to use in our Regression testing. The breakdown of these orders include 50 orders for resale and resale with directory, 26 loop orders, 13 loop with Interim Number Portability, 8 Interim Number Portability, 32 port orders, 7 directory, and 12 loop with port. Regression testing includes new installs, changes, disconnects, outside moves, conversions with changes, suspends, restores, conversion to new, conversion as is, seasonals, and record changes.
- AT&T sent the first order that passed all our edits on May 14.
- The "live" trial with AT&T began on May 20, 1997.

Generation of Firm Order Confirmation(FOC) and Service Order Completion (SOC)

- Unit testing started in October 1996.
- Over 235 tests involving originating, confirmation, completions and error orders. These ranged from simple orders to complex orders that had many circuits and telephone numbers.
- Went into live production in February, 1997.

Mechanized Order Generator enhancements

- Unit testing of the "driver" component began in September, 1996.
- Approximately 100 tests were done consisting of 80 tests of conversion orders, 10 disconnect tests, and 10 cut/restore tests.
- An additional 12 integrated tests were conducted in conjunction with receiving data passed from the upstream system, including 2 tests performed using data that had been provided by AT&T.
- Unit testing of "order generation" components began in November, 1996.
- Over 175 unit tests were performed to create new connect, conversion, disconnect and cut/restore orders and to test programs that reported on orders past due.

SOUTHWESTERN BELL TELEPHONE'S REPLY TO VALU-LINE'S LETTER

Southwestern Bell Telephone (SWBT) submits the following in response to the May 8, 1997, Valu-Line of Kansas (VLK) letter addressed to Mr. Jonathan D. Lee. This letter was included as Tab G in the Attachments to the U.S. Department of Justice's evaluation of the SBC's Section 271 filing in Oklahoma. VLK's letter serves to exemplify the complexity of making electronic interfaces available to CLECs. There are obligations on both sides. SWBT must make Operational Support Systems (OSS) training of its electronic interfaces available to CLECs, and CLECs must in turn understand and apply these electronic interfaces to their business environment. Implementation of OSSs has never been a simple process and the start-up problems experienced by both SWBT and VLK are not unusual. Similar problems were experienced in the exchange access arena when interexchange carriers and the Regional Bell Operating Companies (RBOC) implemented interfaces for access services. As with acccess, both parties must work together and take responsibility to solve the inevitable problems that will surface.

A. CONVERSION CHARGES

1. The specific examples that VLK (VLK letter at 1) cites regarding SWBT's conversion order rates accurately represent the applicable charges. VLK's contract language states that a "per order conversion charge" will apply. While

SWBT regrets the misunderstanding that VLK had regarding the definition of an "order," the intent of that language has always been to recover the cost associated with the amount of service order activity the Local Service Provider Service Center (LSPSC) incurs to handle conversion requests.

2. The SWBT cost study which supports the $25.00 per order charge is based, in large part, on the average time it takes a service representative to handle a conversion service order. Defining this order activity as "per billable", rather than "per billed", telephone number may be the source of the confusion. However, this definition more accurately reflects the work involved and the costs associated with the manual processing of conversion orders. Where a "billed" telephone number may have many billable telephone numbers associated with it, and therefore require a multitude of service orders to process the request, a "billable" telephone number is defined as "any number that could receive its own bill." On March 12, 1997, as soon as this misunderstanding was brought to SWBT's attention, VLK was provided with detailed, written clarification of how this charge is administered. This charge is not a "per telephone" number charge as stated by VLK. If that were the case, the business customer in VLK's example would have been charged an additional $25.00 for the second hunting line. Since that telephone number cannot receive a stand-alone bill, and does not generate additional service order activity, it receives a single conversion charge for the service order work activity associated with the request.

B. NEGOTIATIONS

3. The first negotiation meeting between SWBT and VLK was held on November 14, 1996. In response to VLK's request for Operations Support Systems (OSS) interfaces, SWBT expressed that OSS interfaces would become available on January 1, 1997 and offered to continue OSS negotiations and discussions at that time. VLK did not object to this offer. It was not until March 1997 that VLK pursued access to OSS functionality for local exchange services. This VLK request was directed to their SWBT Competitive Provider Account Manager. It was found that VLK had also begun other electronic interface connectivity with SWBT, but via their interexchange carrier account management contact.

4. At VLK's request on March 6, 1997, SWBT quickly established OSS negotiations on March 7, 1997, that included providing the OSS appendix, as well as discussing rates and the required training opportunity for Residence EASE (REASE) and Business EASE (BEASE). In advance of a signed OSS Appendix, Mr. Nathan Sparks of SWBT did offer to provide an expedited and thorough procedure for establishing OSS access via demonstrations, follow-up meetings, and technical requirement discussions. However, VLK imposed their own timeline in order to expedite live OSS functionality. SWBT's requirement is simply to have agreement on OSS functionality and rates prior to establishing physical connection to OSS interfaces. As it turned out, VLK attended an OSS demonstration on April 3, 1997 and held connectivity discussions in advance of establishing connectivity and going live on April 14, 1997.

C. DEMO

5. VLK letter at 2 sites supposed problems with the April 3 "hands-on" demonstrations in St. Louis. The facts are as follows. On April 3, SWBT delivered a demo that included, but was not limited to Easy Access Sales Environment (EASE). The demo lasted approximately 35 minutes. VLK's claim that REASE "went down" is not accurate. The SWBT manager giving the demo had accessed EASE using a method which required her to go across approximately 4 different SWBT systems before accessing EASE. The system appeared to go down when, in actuality, the system was in a "wait" state that was caused by the fashion in which the user chose to connect to EASE. SWBT personnel reconnected to EASE using a more direct fashion that is comparable to the access method CLECs use. Once the more direct connection was made system response time returned to that which is available to SWBT Business Offices. It should be noted that the average screen-to-screen response time for all EASE transactions is 3 seconds or less. There was no change in hardware between the REASE and Business EASE (BEASE) demos.

D. BUSINESS AND RESIDENCE EASE

6. Throughout the letter, VLK mischaracterizes the uses of BEASE and REASE. VLK letter at 2 states "[t]hat REASE and BEASE were order entry systems. They were of little use for pre-order." EASE can be used as a pre-order system. In a pre-order environment where the customer is requesting new service, EASE performs address validation, as well as product availability by switch, facility information, telephone number selection and due date availability functions. In a pre-order conversion situation, with end-user authorization, EASE will also

display current account information including directory listings and features. In both situations, the pre-order information may be 'held' in EASE for two (2) weeks. If the pre-order information is not resumed by the end of the two week period, the negotiation is deleted.

7. VLK letter at 2 states "We were also informed all conversions would consist of a disconnect and a new order. There is no such thing as a 'conversion' order." EASE does support the conversion process. In the conversion flow, EASE creates both the disconnect and new connect order for the CLEC from a single flow. Existing listings and features available for resale are automatically populated for the CLEC and require no input by the CLEC unless they desire to make a change. It is not necessary for the CLEC to place a separate disconnect order; the disconnect is automatically processed from the conversion flow. The conversion flow automatically relates the two orders to prevent a service interruption. It should also be noted that SWBT systems are currently being modified to allow for a single order conversion process instead of the current two order process. This process is expected to be in place by the end of June 1997.

8. VLK letter at 3 states "[E]ASE systems appear to have been 'modified' to provide less information to us than is available to their business offices." The only modifications made were to remove confidential data such as Credit and Deposit Information as well as other information that has been deemed proprietary (e.g., SWBT rates).

9. VLK letter at 3 states "[i]t was found that the screens and information we were accessing were not the same ones we had been trained on." The EASE system

used in training is the same EASE system used in the production environment. The difference between the training and production environments is that when an EASE user is established in a training mode, EASE retrieves customer account information from a database established specifically for training instead of pulling live customer account information. This is the same training database used in training SWBT sales representatives. Furthermore, with the exception of table changes, system modifications are not made overnight due to the huge amount of coding and testing involved. EASE has scheduled bimonthly releases whereby we make enhancements to the system. To date in 1997, SWBT has installed releases on January 3, March 14 and May 16 with the next release scheduled for July 11.

10. VLK letter at 3 states "Further, we have no access to SORD which SWBT does have open access to." EASE and Toolbar provide a 'user friendly' means of retrieving information from SWBT back office systems such as SORD. SORD is in USOC and FID format, not English language as provided via EASE. The SORD order may be viewed through the Toolbar or EASE.

11. During the early use of EASE by VLK, SWBT became aware of a few issues which prevented some orders from distributing in SORD. These issues were corrected on April 22 and April 25 through immediate releases. Except in the case of Personalized Ring in a conversion scenario, VLK could have still used EASE to transmit their orders. It should be noted that the LSPSC has a means of knowing that a CLEC order has erred in SORD and a process to make any

necessary corrections so the order may be distributed to provisioning systems. All known problems have been corrected.

12. Ms. Judy Hermann from SWBT visited VLK on April 23 and April 24 to personally assist their representatives with EASE system functionality at no charge. Ms. Hermann had planned to stay through April 25, but the VLK representatives indicated they felt comfortable with using EASE and that Ms. Hermann could leave. Ms. Hermann observed that VLK representatives had no trouble maneuvering through the system and was advised that the first week's difficulty was more of a VLK learning curve issue than specific problems with the EASE software. Most of the questions from VLK were Methods and Procedures about SWBT's monthly rates and non-recurring charges.

E. TOOLBAR AND VERIGATE

13. VLK letter at 2 states "Pre-order would be addressed by the Toolbar". While this is a true statement, it should not be construed that only Toolbar provides a pre-order function, as explained in ¶ D.1 above. Through the Toolbar, pre-order functions are available from the Verigate application. Verigate provides these functions for both resold services and unbundled network elements. The functions currently include the verification of address, service availability by switch, PIC list, connecting facility assignment, NC/NCI, dispatch, and due date. Verigate also provides access to telephone number assignment. These functions currently support the establishment of new accounts. Effective June 1, 1997, customer service record information will be available via Verigate, as it is today

via EASE and DataGate, to support account conversion activity. Customer service record information will be provided for single line working telephone number requests. This information includes listing, billing, service and equipment, and directory delivery detail. The next enhancement to Verigate will provide access to consolidated information for all working telephone numbers billed to a single account.

F. BILL PLUS

14. VLK letter at 2 states "[w]e asked why USOCs were not included in the format". Bill Plus provides a computerized version of the paper bill. The paper bill does not reflect USOC information for the monthly charges, which is only reflected in the Customer Service Record (CSR). Bill Plus has been rewritten in a Windows™ format and will include the Auxiliary Service Information (ASI) which is the Customer Service Record information.

G. TOOLBAR AND CUSTOMER NETWORK ADMINISTRATION (CNA)

15. VLK letter at 3 correctly states that CNA (and not Toolbar) is listed in the OSS Appendix to SWBT's agreement with VLK. When the OSS Appendix was initially developed, the applications to check service order status, report trouble and make billing inquiries were a part of SWBT's CNA product. Since that time, Order Status and Trouble Administration were migrated to a new platform, which is now referred to as the SWBT Toolbar. The scheduled conversion of the CNA billing inquiry function to the new platform was delayed, so until it becomes a

part of the Toolbar, a CLEC would need to access the CNA platform if they chose to view their bills via that method. SWBT covers both Toolbar and CNA in the SWBT demo sessions.

H. SYSTEM AND CIRCUIT SET-UP

16. VLK letter at 1 states "Our experiences with Southwestern Bell in the area of local service have been trying". SWBT regrets this impression. SWBT has strived to provide VLK with requirements for systems but VLK management often has not worked cooperatively. For example, during the initial OSS demo, VLK was informed that SWBT highly recommended using a commonly available software product – Chameleon from NetManage – for 3270 emulation for REASE. Mr. Tidwell of VLK indicated he understood and that he thought VLK had that product at their site. The following week, SWBT spent the better part of four days working with VLK to get a different package they wished to use (ProComm Plus) to work while explaining that it is not compatible with Windows™ 95 and that it would not work effectively for REASE.

17. Even while our Help Desk agents are trying to explain what has been - or is being - done to alleviate a problem, VLK management continues to insist that problems be escalated to the highest possible level. When appropriate, problems have been escalated but not all problems are severe enough to require (or benefit from) this kind of escalation.

18. VLK letter at 3 claims that SWBT personnel did not know how to install a 56K circuit. This accusation borders on the absurd. In actuality, VLK was responsible

for the provisioning of their 56K circuit through their own carrier to a termination at the point of demarcation in SWBT's facilities in Dallas. SWBT personnel in Dallas had to wait for the circuit to be set up. Once the circuit was terminated in Dallas, SWBT network operations personnel completed their work the same morning and connectivity was established and tested with VLK the same day.

I. SWBT REBUTTAL TO VLK'S SPECIFIC COMMENTS ON THE AFFIDAVIT OF ELIZABETH HAM

19. Paragraph 14 - The most important function of the Information Services Call Center, or Help Desk, is to provide a single point of contact on Information Services technical issues for CLECs. While Help Desk personnel are not application experts, they do accept all calls and take "ownership" of all problems referred to them. Help Desk personnel are working very hard to increase their application-specific knowledge. Where possible the caller will be provided with the resolution during the initial call. If the problem can not be solved during the initial call, Help Desk personnel follow through and provide feedback to the caller in the most timely manner possible. In many instances this requires a great deal of coordination with other SWBT groups and organizations. Often, the caller does not see this and may not be aware of how much work is being done off-line for them.

20. Mr. Tidwell of VLK has stated during telephone conversations with SWBT's Kevin Tollefson, that he does not have any complaints with the service provided by the IS Call Center.

21. SWBT has reviewed VLK's trouble tickets and determined that SWBT has been able to close 50% within 10 minutes and 76% within 1 hour. In reference to the VLK statements about connectivity problems, approximately 25% of the calls (29 tickets out of a total of 106) refer to connectivity or long wait times. Of these 29, 17 are for BEASE, 4 are for REASE and 8 are for Toolbar.

22. Paragraph 20 - Pre-order functions in Verigate currently support the establishment of new accounts. Effective June 1997, customer service record information will be available to support account conversion activity. Customer service record information will be provided for single line working telephone number requests and include listing, billing, service and equipment, and directory delivery detail. The next enhancement to Verigate will provide access to consolidated information for all working telephone numbers billed to a single account.

23. Paragraph 27 - Southwestern Bell is completing the initial development phase of the Lsr EXchange System (LEX) which is a graphical user interface that will allow CLECs mechanically to create and submit national standard formatted LSRs for ordering resold services and unbundled network elements. Two CLECs have committed to participate in application tests of LEX. The initial concentration will involve unbundled network elements. The second test will concentrate on resale orders. The initial test is scheduled to begin in mid-June and the second test is slated for July 1997.

24. Paragraph 28 - The following is a complete list of unscheduled interruptions in EASE system availability that may have impacted VLK and all SWBT EASE users:

During the month of April 1997:

* On April 17 from 4:05 p.m. to 4:10 p.m. SWBT recorded a problem where EASE lost the connection to our back office systems.
* On April 28 SWBT recorded a problem whereby EASE experienced extremely slow screen to screen response time. In an effort to correct the problem, SWBT lost connectivity to our back office PREMIS address validation system.

During the month of May 1997:

* SWBT recorded a problem on May 6 from 8:18 a.m. to 8:58 a.m. where EASE lost the connection to SWBT back office systems.

Again, EASE system problems impact SWBT business offices in the same manner and to the same extent as they impact a CLEC.

25. In order to help determine the cause of VLK's supposed slow response time and lock ups in BEASE, SWBT has asked VLK to provide copies of a log file from their system. SWBT requires this log for problem resolution. SWBT has received only three (3) copies of this log. The last time SWBT requested the log, SWBT was told by VLK that was "too much trouble" and VLK was not going to provide it to SWBT. SWBT stands ready to assist VLK with the supposed slow response time and lock up problems, however, VLK must cooperate by providing the information required to resolve the supposed problems.

26. EASE can be used to negotiate 95-97% of all residential orders. Because there are a low volume of hunting orders for residential customers, these orders are not a high priority for EASE. SWBT business offices themselves negotiate hunting outside of EASE.

27. SWBT and VLK held a conference call on May 22, 1997 to discuss the Distributed Service Order File. Prior to this time SWBT and VLK had focused attention on the expedited turn-up of the EASE interfaces. Transmissions of the Distributed Service Order File can begin at VLK's request. SWBT has provided documentation and will continue to discuss the options and requirements necessary to accept the file. VLK indicated to SWBT they plan to program their information systems to pull the data they desire from SWBT's standard format.

28. Paragraph 40 - Installation charges should be waived (negated) on the service order for straight conversion orders. There would be no charges by adding the Negate S&E charge (NSE) FID. This information was covered with VLK during the on site training of April 23 - 24, 1997.

29. The edit problems on the Kansas Universal Service Fund have been corrected. The EASE tables for VLK incorrectly included the USOC for the Service Fund which caused the system to invoke internal edits. The USOC was removed from the tables as soon as SWBT was notified of the problem.

30. Paragraph 41 - VLK does have to establish a connection and sometimes a VAN (Value Added Network) to provide the functionality to receive a bill. SWBT is willing to discuss EDI as a Billing option if VLK is interested. This information was provided to VLK in the OSS demo on April 3, 1997.

31. Paragraph 42 - Resale is not billed via CABS, therefore no access is required to the CABS database.

32. Paragraph 59 - SWBT currently captures disconnect activity for competitive reasons through unique DCR (disconnect reasons) codes placed on the disconnect order. SWBT employs an external firm to conduct customer surveys. Once a month a file of these disconnected customers is sent to the outside firm. The survey itself is a questionnaire focusing on the customer's past experience with SWBT. Also, based on the DCR for competitive reasons, SWBT will send letters to the disconnected customers. The intent of this letter is to 1) verify the disconnect, 2) express SWBT's appreciation in being able to serve the customer and 3) leave an open door policy in case the customer chooses to return to SWBT. Regarding both methods of customer contact, no attempt is made to switch the customer from any CLEC. All information acquired for use in this effort appears solely on the SWBT Disconnect order. SWBT does not access any information from the customer's new connect for service with the CLEC. Attached hereto is SWBT's "no winback" policy letter.

ATTACHMENT C

Southwestern Bell

"The One to Call On"

August 14, 1996

TEST
314 OUR STREET
SPRINGFIELD MO 78333-3333

(417) 999-9999 999

DEAR TEST

I have noticed that you have disconnected your telephone service from Southwestern Bell. As an employee who values your business, I want to be sure that this information is correct. If you're not canceling your service, please contact us at 1-800-246-4999. We will update your records and re-establish your telephone number and your service.

If it is your intention to disconnect your service, we at Southwestern Bell regret that we're losing you as a customer. You can be sure of a warm welcome should you choose to return at a later date.

During the past century, we have taken great pride in providing quality telephone service. Our continuing objective to provide customized, convenient and reliable service extends to each and every customer. That's a commitment from all Southwestern Bell employees.

If we can be of service to you in the future, please let us know. Just give us a call at 1-800-246-4999 and one of our customer service specialists will be happy to help you.

We value your relationship with us.

Sincerely,

Sharon L Gross

Sharon Gross
General Manager - Residence Service Center
220 E. 6th Room 570
Topeka, KS 66603

RM 9101
Comments of SBC
July 10, 1997

Affidavit of William R. Dysart
Filed with SBC Application for Provision of In-Region InterLATA
Service in Oklahoma (CC Docket 97-121)

BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554

In the matter of	)	
	)	
Application of SBC Communications Inc.,	)	
Southwestern Bell Telephone Company,	)	CC Docket No. 97-121
and Southwestern Bell Communications	)	
Services, Inc., for Provision of In-Region,	)	
InterLATA Services in Oklahoma	)	

AFFIDAVIT OF WILLIAM R. DYSART

I, WILLIAM R. DYSART, being duly sworn, deposes and states as follows:

1. My name is William R. Dysart. My business address is One Bell Center, Room 15-X-3, St. Louis, Missouri 63101. I am Area Manager-Performance Measurements for Southwestern Bell Telephone Company ("SWBT"). In this position I am responsible for the development of a performance measurement system to ensure SWBT is meeting all contractual performance obligations with CLECs. I am also responsible for providing reports on performance and parity to state and federal regulatory entities, and to investigate complaints on parity of service.

EDUCATION AND PROFESSIONAL EXPERIENCE

2. I received a B.A. degree in 1978 from Central Methodist College in Fayette, Missouri. I have 19 years experience with SWBT. I have held numerous jobs in our Network Engineering, Network Operations and Customer Services organizations. I was selected by SWBT to receive extensive training in Statistical Process Improvement methods, and I am one of our company's internal Certified

Quality Consultants.

3. The purpose of my affidavit is to provide SWBT's reply to the opposition on the issue of Performance Measurements in conjunction with SWBT's application for in-region interLATA relief in Oklahoma.

PERFORMANCE MEASUREMENTS

4. This category addresses SWBT's position regarding the development of performance measurements and reporting schedules, and the deployment of such measurements as suggested by several CLECs and Michael J. Friduss on behalf of the Antitrust Division of the U.S. Department of Justice. AT&T Pfau Aff., MCI Agatston Aff. ¶ 9 & Friduss Aff.

5. SWBT is concerned about the DOJ's statement in the Evaluation of the U.S. Department of Justice page 60: "... SBC has not agreed to report its performance in several areas critical to CLEC competitive entry". First, as is described in detail below, SWBT already has developed and can report a number of performance measurements that address many of the issues raised by DOJ. Second, the Commission should be aware that, on a conference call in February of this year (with Department representatives Jonathan Lee and Stuart Kupinsky, DOJ consultant Chuck Hemptling, and SBC representatives Elizabeth Ham and Martin Grambow), SBC offered to meet with the DOJ and its consultants to discuss appropriate performance measurements. To date, the DOJ has not initiated a meeting, and SWBT's first notice of any interest by the DOJ with regard to the use of specific performance measurements was with the affidavit of DOJ consultant Michael Friduss.

6. AT&T's Affidavit of C. Michael Pfau presumes to address nondiscriminatory access to SWBT's Operational Support Systems (OSS) by AT&T. However, he addresses non-OSS performance issues, and suggests that the performance measurements that the Local Competition Users Group (LCUG) developed be imposed upon SWBT and presumably any other ILEC. AT&T Pfau Aff. ¶ 17. The LCUG's performance standards were unilaterally developed by the LCUG based on their experience in the long distance market which has no relevance to the local market nor parity in the provision of access to OSS. AT&T Pfau ¶ 38.

7. SWBT did not present a detailed discussion of performance standards recommended by the in the Oklahoma 271 application, since the performance standards recommended by the DOJ, Mr. Pfau and Mr. Friduss are <u>not</u> a required checklist item under the 1996 Act or FCC rules. Moreover, we have negotiated over a dozen interconnection agreements in Oklahoma and, as Mr. Friduss points out, performance measurements have not been a focus of any of these agreements. Friduss Aff. ¶ 49. This strongly suggests that performance measurements are not especially important to the CLECs. The Act contemplates that the parties to an interconnection agreement will negotiate needed terms and conditions. To the extent that a CLEC can not obtain a term or condition that the CLEC believes is important, the CLEC may request mediation or arbitration of the issue. Both AT&T and MCI chose to arbitrate multiple issues which they thought were important. The list of performance standards suggested by the DOJ and Mr. Friduss, Mr. Pfau and Mr. Agaston were either denied by the OCC or not raised as an issue to be arbitrated by the CLECs. The DOJ and FCC should not interfere

with the negotiation-arbitration process established by Congress by belatedly requiring OSS-related terms and conditions that are not specifically required by the Act. Similarly, the FCC is not authorized to deny SWBT's request for 271 relief on the grounds that the negotiated and arbitrated agreements do not contain one or more performance standards suggested by Mr. Friduss or the CLECs and which extend the competitive checklist.

8. AT&T as well as Mr. Friduss states that OSS response times are a required measurement to judge parity for pre-ordering. AT&T Pfau Aff. ¶ 20 & Friduss Aff. ¶ 61. As noted by the Affidavit of Elizabeth E. Ham. ¶ 20 - 25, SWBT provides all CLECs with a choice of three electronic interfaces for pre-ordering: Easy Access Sales Environment ("EASE"), Verigate, and DataGate. Ham Aff. ¶ 21. The access to these systems is gained via the Remote Access Facility ("RAF"). AT&T states that "parity requires that CLEC customer service representatives have the same access to information regarding appointment scheduling, service and feature availability, address verification, requests for phone numbers and customer service records that are available to SWBT's representatives". AT&T Pfau Aff. ¶ 20. EASE is the same on-line system that is used by SWBT's own retail service representatives in both business and residence. It will afford the CLECs precisely the same access to pre-ordering capabilities that SWBT offers to its retail service representatives. Ham Aff. ¶ 22. Therefore, SWBT's pre-ordering for OSS meets AT&T's definition of parity.

9. Two options exist for pre-ordering of unbundled network elements (UNE): Verigate and DataGate. Verigate is a SWBT graphical user interface that operates